

Amy G. Rabinowitz, Esq.
Massachusetts Electric Company
Nantucket Electric Company
25 Research Drive
Westborough, MA 01582-0099

June 26, 2003

BY FAX AND U.S. MAIL

RE: Massachusetts Electric Company and Nantucket Electric Company, D.T.E. 03-2

Dear Ms. Rabinowitz:

Enclosed please find the Department's second set of information requests in the above-captioned matter. Responses should be filed on or before July 8, 2003. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Joseph Rogers, Assistant Attorney General

Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
MASSACHUSETTS ELECTRIC COMPANY AND
NANTUCKET ELECTRIC COMPANY**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Massachusetts Electric Company and Nantucket Electric Company the following information requests with respect to the above-captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Massachusetts Electric Company in this proceeding.

1. "MECo" or "Company" means Massachusetts Electric Company and Nantucket Electric Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents the Companies filed in this proceeding.
3. "2003 Plan" means the 2003 Energy Efficiency Plan the Company filed with the Department on January 14, 2003 in the above-captioned proceeding.
4. "Guidelines" means Guidelines for the Methods and Procedures for the Evaluation and Approval of Energy Efficiency Programs, D.T.E. 98-100, Att. 1 (2000).
5. "DOER" means Commonwealth of Massachusetts Division of Energy Resources.
6. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. All discovery documents filed with the Department and all documents offered as exhibits shall be accurately punched to fit a standard three-hole binder. All documents shall be accompanied by a cover letter describing the filing and noting the distribution of copies.
7. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
8. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

9. The phrase “provide complete and detailed documentation” means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
10. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
11. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
12. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Gene Fry, Electric Power Division; and (3) Robert Harrold, Electric Power Division.

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DTE-2-1 Refer to IR DTE-1-9 (Revised) Amended App. A-v2, and the 2003 Plan, Table 2. In IR-DTE-1-9 (Revised), the budget column for Program Implementation Expenses shows \$982,100 for the Energy Star Appliances program. However, the 2003 Plan, Table 2 shows \$2,184,300 in corresponding expenses for the same program (indicated in four columns (Planning & Administration + Program Marketing + Customer Incentive + Program Implementation)). The \$982,100 Energy Star Appliances Program expenses indicated in IR-DTE-1-9 (Revised) appears to correspond the sum of those same four expenses listed immediately above line 8b (Residential Lighting) of the 2003 Plan, Table 2, at 1.

Please clarify what the expenses are for the Energy Star Appliances program, provide amended tables as needed, and make any necessary revisions to the benefit/cost ratio for this program.